

RECEIVED

MAR 17 2025

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
:
v. : Mag. No. 25-3014 (TJB)
:
MARTIN ERVIN TORRES-REYES :
:
:

I, Ellen Chao, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

s/ Ellen Chao

Ellen Chao
Deportation Officer
U.S. Department of Homeland Security
Immigration and Customs Enforcement

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A)
on March 17, 2025,
in the District of New Jersey.



Hon. Tomianne J. Bongiovanni
United States Magistrate Judge

ATTACHMENT A

On a date on or after October 15, 2014, and on or before March 7, 2025, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

MARTIN ERVIN TORRES-REYES,

being an alien who was deported and removed and had departed the United States while an order of deportation and removal was outstanding, and thereafter, without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter and was found in the United States.

In violation of Title 8, United States Code, Sections 1326(a).

ATTACHMENT B

I, Ellen Chao, am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. At all times relevant to this Complaint, the defendant, MARTIN ERVIN TORRES-REYES (hereafter "TORRES-REYES"), was a native and citizen of Mexico, and not a citizen of the United States.

2. On or about October 11, 2014, TORRES-REYES was ordered removed from the United States to Mexico pursuant to an order of expedited removal under 8 U.S.C. § 1225(b)(1) issued by a United States immigration officer.

3. On or about October 15, 2014, TORRES-REYES was removed from the United States to Mexico while the above-referenced order of removal was outstanding.

4. Following his removal from the United States, TORRES-REYES knowingly and voluntarily reentered the United States without permission on an unknown date at an unknown location.

5. On or about March 7, 2025, TORRES-REYES was arrested by federal law enforcement in or around Ocean County, New Jersey, in the District of New Jersey.

6. A fingerprint analysis revealed that TORRES-REYES is the same individual who was removed from the United States to Mexico and who was arrested in the United States on March 7, 2025, as set forth in paragraphs 3 and 5 above.

7. A review of relevant databases revealed that neither the Attorney General nor the Secretary of Homeland Security of the United States expressly consented to TORRES-REYES reapplying for admission to the United States prior to his reembarkation at a place outside the United States, or to his reentry into the United States.